

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE *EX PARTE* APPLICATION OF
Ibiuna Crédito Gestão de Recursos Ltda., Travessia
Securitizadora de Créditos Financeiros S.A., and Travessia
Securitizadora de Créditos Financeiros XXXII S.A.

Case No. 24-MC-0013

Petitioners,


For an Order Pursuant to 28 U.S.C. § 1782 to Take
Discovery for use in Foreign Proceedings in the Federal
Republic of Brazil.

**EX PARTE APPLICATION AND PETITION FOR AN ORDER TO CONDUCT
DISCOVERY FOR USE IN FOREIGN PROCEEDINGS PURSUANT TO 28 U.S.C. § 1782**

Ibiuna Credito Gestão De Resumos LTDA, Travessia Securitizadora de Créditos Financeiros XXXII S.A., and Travessia Securitizadora De Créditos Financeiros S.A. (“Petitioners”), pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 30, 34, and 45, respectfully applies to this Court for an order in the form attached as Exhibit B to the “Memorandum of Law in Support of *Ex Parte* Application For Order Pursuant to 28 U.S.C. § 1782 Authorizing Petitioners to Conduct Discovery For Use in Foreign Proceedings” in the form of the subpoenas attached as Exhibit A to the same. In support of their application and petition, Petitioners submit a Memorandum of Law and attach the declaration of José Luiz Bayeux (the “Bayeux Decl.”) dated January 8, 2024, in addition to exhibits attached to it.

Dated: January 9, 2024.

Respectfully Submitted,



/s/Gabriela Menna Barreto Scanlon
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